

REMARKS

In the Office Action, Claims 5-8 have been allowed, and Claims 3-4 and 11-12 have been objected to as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form including all of the limitations of the rejected base claim and any intervening claims. At this time, Applicants are not submitting amendments to the objected-to claims, since Applicants believe that the rejected claims, Claims 1-2 and 9-10 are also allowable over the cited prior art.

Claims 1-2 and 9-10 have been rejected as anticipated by the Balogh patent. The Balogh patent teaches a system and method whereby text which describes stored images is compared to a query using natural language processing. According to the Balogh method, words are compared to words (i.e., the descriptive text is compared to the query text), after which the image associated with the descriptive text which most closely matches the query text is retrieved for viewing and possible licensing by the user. In the cited Balogh teachings found at Col. 12, lines 7-32, to make query processing more effective, Balogh cross-references stored text information (i.e., the descriptive words for various images) prior to receipt of any query. As explicitly taught in Col. 12, lines 21-22, for example "... an association has previously been entered into the database between Paris and France". Such pre-query indexing of text is not the same as nor

suggestive of the claimed step of transforming a database based on user input received after presentation of retrieved data to the user in response to a user query, as is explicitly set forth in both independent Claims 1 and 9, as well as Claims 2 and 9 which depend therefrom.

With specific reference to the claim language, the Balogh patent provides no teaching of receiving user input after presenting retrieved data to a user. The cited teachings at Col. 12 regarding user input refer to the initial inputting of a query and not to user input in response to retrieved results. In addition, Applicants assert that the Balogh patent provides no teachings of dynamically transforming the database based on the user input, as set forth above, since Balogh indexes its text prior to query processing and not based on user input. Furthermore, Applicants argue that Balogh provides no teaching of generating a transformed database which is thereafter searched since Balogh creates a first cross-referenced database prior to query processing. Finally, Balogh provides no teaching of iteratively repeating such steps until the query is satisfied. The teachings cited at Cols. 11, 12 and 13 again refer to "original" query processing, including receiving the original user query input and comparing the query text to stored text. The cited teachings do not, however, disclose iteratively transforming and searching a transformed database until a query is satisfied.

For a reference to anticipate claim language under 35 USC § 102, that reference must teach each and every claim feature. Applicants respectfully assert that the Balogh patent does not teach the claimed features as set forth above since it provides no teaching of receiving user input after presenting retrieved data to a user; provides no teachings of dynamically transforming the database based on the user input; provides no teaching of generating a transformed database which is thereafter searched; and, provides no teaching of iteratively repeating such steps until the query is satisfied; and cannot, therefore, be said to anticipate the claims. Accordingly, Applicants respectfully request withdrawal of the rejections of Claims 1-2 and 9-10 and withdrawal of the objections to Claims 3-4 and 11-12.

With specific reference to the language of Claims 2 and 10, Applicants also assert that the Balogh patent not only does not teach transforming the database, but further does not teach or suggest reformulating the query based on user input, wherein the successive searching of the transformed database further comprises searching using the reformulated query. The cited teachings from Col. 13, line 52 through Col. 14, line 20 refer to juxtaposing query words to match the format in which the descriptive text is stored in the database. Such a restating or juxtaposing of words is not the same nor suggestive of reformulating a query based on user input received after presentation of retrieved data. Again, Applicants assert that

the cited reference does not anticipate the invention as expressly claimed and respectfully request withdrawal of the rejections of Claims 2 and 10 based on the Balogh patent teachings.

Based on the foregoing remarks, Applicants respectfully request withdrawal of the objections and rejections, and issuance of the pending claims.

Respectfully submitted,
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